

# EXHIBIT C



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## SHAREHOLDER AND CLASS ACTION LITIGATION

For over 40 years, Chestnut & Cambronne, P.A. has been representing clients in class action litigation both in the Twin City area and nationally. Since its inception, Chestnut & Cambronne has been engaged in complex litigation throughout the country and successfully prosecuted and defended class litigation addressing substantive legal questions in the fields of securities, ERISA, banking, antitrust, and consumer law. Representative class action cases resolved in the last few years wherein the firm or its members acted as lead counsel or co-lead counsel include the following:

In re Xcel Energy Securities, Derivative & "ERISA" Litigation, 286 F.Supp.2d 1047 (D. Minn. 2003). This was a securities fraud class action in which Chestnut & Cambronne was co-lead counsel. The class recovered \$80 million.

Alford, et al. v. Mego Mortgage Home Loan Owner Trust 1997-1, et al.; Mazur, et al. v. Empire Funding Home Loan Owner Trust 1997-1, et al.; Banks, et al. v. FirstPlus Home Loan Trust 1996-2, et al. Pending consumer lending cases wherein Karl L. Cambronne acted as co-lead counsel.

In re E.W. Blanch Holdings, Inc. Securities Litigation - (United States District Court, District of Minnesota, Civil No. 01-258 JNE/JGL) (Securities Fraud). This is a settled securities fraud class action in which Karl Cambronne served as lead counsel. The class recovered \$20 million.

Cooper v. Miller, Johnson, Steichen & Kinnard - (United States District Court, District of Minnesota, No. 02-CV-1236 RHK/AJB) (Securities Fraud). This is a settled securities fraud class action in which Karl Cambronne served as lead counsel. The class recovered \$5.6 million.

In re Blue Cross Subscriber Litigation - (State of Minnesota District Court, Dakota County, Case No. 19-C3-98-7780) (Consumer/Policyholder). This is an action on behalf of Blue Cross subscribers. Over \$41 million was recovered for Blue Cross policy holders. Karl L. Cambronne served as lead counsel.

Cates, et al. v. U. S. Bank, National Association, N.D. – (State of Minnesota District Court, Hennepin County, Case No. 04-6202) (Consumer). Karl L. Cambronne served as co-lead counsel for the class. Class members received \$25 million.

In re U.S. Bancorp Litigation, 291 F.3<sup>rd</sup> 1035 (8<sup>th</sup> Cir. 2002) (Consumer/Privacy). The class received \$3 million. Karl L. Cambronne acted as lead counsel.

Personal Injury Protection Consumer Litigation (Yost v. Allstate Insurance Co. (Hennepin Co. No. MC 00-16522), Gerriets v. Western National Mutual Insurance Co. (Hennepin Co. No. MC 00-16563), Olson v. American Family Mutual Insurance Co. (Hennepin Co. No. MC 00-16519), Demmer v. Illinois Farmers Insurance Co. (Hennepin Co. No. MC 00-17872), Arent v. State Farm Mutual Automobile Insurance Co. (Hennepin Co. No. 00-16521)). (Consumer Fraud Insurance) These are settled consumer and statutory violations class actions against automobile insurance companies that sold unlawful personal injury protection insurance to Minnesota senior citizens. Karl Cambronne served as lead counsel for the class members in all cases. Class members have received a full return of wage loss premiums previously paid.

Steinhartz v. Saturn Transportation System, Inc. (United States District Court, District of Minnesota, Civil No. 00-2489 JEL/JGL). (Consumer/Leases) This is a settled consumer class action that alleged a trucking company underpaid its independent contractor truckers. Karl Cambronne served as lead counsel. Class members received \$450,000.

Chestnut & Cambronne also has experience defending class litigation. See, e.g.,

In re K-Tel, 300 F.3d 881 (8th Cir. 2002).

Chestnut & Cambronne also has a wealth of experience in shareholder derivative litigation. See, for example:

*In re UnitedHealth Shareholder Derivative Litigation*, 754 N.W.2d 544 (Minn. 2008);

*Professional Management Assocs., Inc. v. Coss, et al.*, 574 N.W.2d 107 (Minn. Ct. App. 1998);

*Professional Management Assocs., Inc. v. Coss, et al.*, 598 N.W.2d 406 (Minn. Ct. App. 1999);

*Drilling v. Berman*, 589 N.W.2d 503 (Minn. Ct. App. 1999);

*Stockey v. Berryman*, 632 N.W.2d 242 (Minn. Ct. App. 2001); and

*Arndt v. Distribution Sciences*, 975 F.2d 1370 (8th Cir. 1992).

Not only do the results obtained in the above cases attest to the skill and competence of Chestnut & Cambronne lawyers in shareholder litigation, various courts have publicly commended Chestnut & Cambronne for its efforts:

Plaintiffs' co-lead counsel have significant experience in representing shareholders and shareholder classes in federal securities actions around the country and in this district in particular. Counsel-both the lawyers representing lead plaintiffs and defendants-conducted themselves in an exemplary manner. ... Thus, the effort of counsel in efficiently bringing this case to fair, reasonable and adequate resolution is the best indicator of the experience and ability of the attorneys involved, and this factor supports the court's award of 25%.

*In re Xcel Energy, Inc. Sec. Derivative & "ERISA" Litig*, 364 F. Supp. 980, 995-996 (D. Minn. 2005).

*In Heller v. Schwan's Sales Enterprises, Inc.*, 548 N.W.2d 287, 291 (Minn. Ct. App. 1996), the court of appeals in commenting upon the conduct of Chestnut & Cambronne and the other counsel representing the class, concluded:

The district court stated that the class counsel "are known to this Court to be competent litigators with extensive class action experience." The court found that the class counsel "provided a substantial common benefit to the plaintiff class by zealously pursuing and funding this litigation."